

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

FILED - GR
September 11, 2019 2:17 PM
CLERK
U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
BY: NS
Scanned JW 9-11-19

CLARENCE OTWORTH,

Plaintiff,

V.

CASE NO. 1:19-cv-621

HON. PAUL L. MALONEY

TONY MOULATSIOTIS,
LISA SWANSON,
TAMMY STEPHENSON,
JESSICA KIDDER,
CHERYL MOSS,
DANA NESSEL,
SAMANTHA REASNER,
GRETCHEN WHITMER,
MUSKEGON COUNTY,
VILLAGE OF LAKEWOOD CLUB,
DALTON TOWNSHIP,

Defendants.

**PLAINTIFF'S RESPONSE TO PLUNKETT COONEY SECOND MOTION TO DISMISS
AND
PLAINTIFF'S SECOND MOTION TO RECUSE MAGISTRATE JUDGE RAY KENT**

On August 30, 2019, Bret Myers (Plunkett Cooney) filed a motion to dismiss for his clients Lisa Swanson and the Village of Lakewood Club. He complained about the plaintiff filing two lawsuits about the same crimes committed a second time by defendants Lisa Swanson, Village of Lakewood Club, Tammy Stephenson, Dalton Township, and Muskegon County, even though the lawsuit named six new defendants: Tony Moulatsiotis, Jessica Kidder, Cheryl Moss, Dana Nessel, Samantha Reasner, and Gretchen Whitmer. Obviously, Bret Myers believes that these defendants cannot be sued for committing the same crimes twice, but are entitled to commit the same crimes over and over and over, and over, ad infinitum without consequences. That is stupid!

On September 03, 2019, Bret Meyers filed the same exact motion to dismiss plaintiff's lawsuit a second time. He objected to the plaintiff submitting the same un-litigated arguments a second time, but believes that it is acceptable for him to file the same wearisome opinions of corrupt judges a second time.

Bret Meyers forgot to enclose a letter to his corrupt puppet, Magistrate Judge Ray Kent, when he filed his motion to dismiss on August 30, 2019, so he filed his motion to dismiss again on September 03, 2019, and enclosed his letter.

WHEREFORE, the plaintiff is entitled to file his motion to recuse Magistrate Judge Ray Kent a second time. Copy enclosed.

September 09, 2019.



Clarence Otworth
187 East Daniels Road
Twin Lake MI 49457
(231) 292-1205

CERTIFICATE OF SERVICE

I, Clarence Otworth, state that I served the above by mailing a copy to Bret T. Meyer, **PLUNKETT COONEY**, at 333 Bridge Street, Ste. 530, Grand Rapids, MI 49504, Attorneys for Defendants Lisa Swanson and the Village of Lakewood Club.

And I mailed a copy to: Allan C. Vander Laan and Bradley C. Yanalunas, **CMDA PLC**, Cummings, McClorey, Davis & Ocho, at 2851 Charlevoix Drive, S.E., Suite 327, Grand Rapids, MI 49546, Attorneys for Defendants Tony Moulatsiotis, Cheryl Mows, and Muskegon County.

And I mailed a copy to: Ross A. Leisman and James F. Scales, **MIKA MEYERS PLC**, at 900 Monroe Avenue, N.W., Grand Rapids, MI 49503, Attorneys for Defendants Dalton Township, Tammy Stephenson, and Jessica Kidder.

And I mailed a copy to Kyla Lillian Ragatzki and Jessica McGivney, Assistant Attorneys General, **DEPARTMENT OF ATTORNEY GENERAL**, P.O. Box 30754, Lansing, MI 48909, Attorneys for Defendants Gretchen Whitmer, Dana Nessel, and Samantha Reasner, on September 09, 2019.

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

CLARENCE OTWORTH,

Plaintiff,

v.

CASE NO. 1:19-CV-55

FIFTH THIRD BANK, et al.,

HON. PAUL L. MALONEY

Defendants.

Douglas M. Hughes (P30958)
120 West Apple Ave. P.O. Box 599
Muskegon, MI 49443-0599
Telephone: 726-4857
Attorney for Defendants
WILLIAMS & HUGHES, PLLC,
and Shon Anne Cook (51452)

Clarence Otworth
Plaintiff
187 East Daniels Road
Twin Lake, MI 49457
(231) 292-1205

Samantha Loree Reasner (P81148)
Department of Attorney General
P.O. Box 30754
Lansing, MI 48909
Telephone: (517) 335-7573
Attorneys for Defendant
William Duncan Schuette

Jason M. Renner (P74476)
DINSMORE & SHOHL LLP
900 Wilshire Drive, Suite 300
Troy, MI 48084
Telephone: (248) 203-1617
Jason.renner@dinsmore.com
Attorneys for Defendants
Fifth Third Bank, Paul Allen Bixler,
F.E. Troncone, P. Brian Moore,
Phillip C. Bodle, Barbara A. Ibold
and Jonathan Meade.

Ross A. Leisman (P41923)
James F. Scales (P406339)
MIKA MEYERS, PLC
900 Monroe Avenue, N.W.
Grand Rapids, MI 49503
Telephone: (516) 632-8047
Attorneys for Defendants
Dalton Township, Tammy
Stephenson, Dalton Township
Treasurer, and Lori K. Hayes,
Dalton Township Clerk.

Allan C. Vander Laan (P33693)
Bradley C. Yanalunas (P80528)
Cummings, McClorey, Davis & Acho
2851 Charlevoix Drive, S.E., Suite 327
Grand Rapids, MI 49546
Telephone: (616) 975-7470
avanderloaan@cmda-law.com
byanalunas@cmda-law.com
Attorneys for Defendants Muskego County,
Muskegon County Board of Supervisors,
Muskegon County Board of Commissioners
and D.J. Hilson

Brett T. Meyer (P75711)
PLUNKETT COONEY
333 Bridge Street, Ste.539
Grand Rapids, MI 49594
Telephone: (616) 757-4605
Attorneys for Defendants
Village of Lakewood Club
and Lisa Swanson

**MOTION TO RECUSE MAGISTRATE JUDGE RAY KENT
FOR BIAS AGAINST PRO SE LITIGANTS AND CORRUPTION
AND
MOTION TO SET THIS CASE FOR TRIAL**

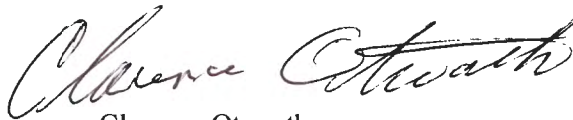
Now comes the plaintiff and complains about the bias of Magistrate Judge Ray Kent. Plaintiff filed a motion to recuse Kent in case 1:18-CV-625 in March, but he was not notified as to who replaced him. He forgot that Kent was also assigned to this case, but did not forgot his bias. Plaintiff wants him removed from this case and from Case 1:19-cv-621. Of course Kent wanted to be assigned to plaintiff's case against Tony Moulatsiotis, et al. He wants to prevent discovery like he has in case 1:18-cv-625, and in this case. He shut both cases down by ignoring every pleading that the plaintiff filed. He wants to do the same in case 1:19-cv-621. The SOB is not only bias he is corrupt. He has not issued a scheduling order in case 1:18-cv-625 or in this case because the defendants attorneys do not want discovery.

CONCLUSION AND RELIEF REQUESTED

For the reasons stated above, the court must grant plaintiff's motion to recuse Magistrate Judge Ray Kent, and grant plaintiff's motion to set this case for trial. Defendants and their attorneys will be prejudiced by the removal of their puppet Magistrate Judge, but they will not be prejudiced by plaintiff's motion to set this case for trial.

WHEREFORE, Plaintiff request that this Court begin to act like an honorable Court and grant plaintiff's motions.

September 09, 2019.



Clarence Otworth
187 East Daniels Road
Twin Lake, MI 4945
(231) 292-1205

VERIFICATION

I, Clarence Otworth, declare under penalty of perjury that I have read the above, and that the matters stated therein are true to the best of my knowledge, information, and belief.


Clarence Otworth

CERTIFICATE OF SERVICE

I, Clarence Otworth, state that I served the above by mailing a copy to Jason M. Renner, DINSMOR & SHOHL LLP, at 900 Wilshire Drive, Suite 300, Troy, MI 48084, Attorneys for Defendants Fifth Third Bank, Paul Allen Bixler, F.E. Troncone, P. Brian Moore, Phillip C. Bodle, Barbara A. Ibold, and Jonathan Meade.

And I mailed a copy to: Allan C. Vander Laan and Bradley C. Yanalunas, CMDA PLC, Cummings, McClorey, Davis & Ocho, at 2851 Charlevoix Drive, S.E., Suite 327, Grand Rapids, MI 49546, Attorneys for Defendants Muskegon County, D.J. Hilson, Muskegon County Board of Supervisors, and Muskegon County Board of Commissioners.

And I mailed a copy to: Ross A. Leisman and James F. Scales, MIKA MEYERS PLC, at 900 Monroe Avenue, N.W., Grand Rapids, MI 49503, Attorneys for Defendants Dalton Township, Tammy Stephenson, Dalton Township Treasurer and Lori K. Hayes, Dalton Township Clerk.

And I mailed a copy to: Douglas M. Hughes, WILLIAMS HUGHES, PLLC , 120 West Apple Avenue, P.O. Box 599, Muskegon, MI 49443-0599, Attorney for Defendant Williams Hughes, PLLC, And Shon Anne Cook.

And I mailed a copy to: Bret T. Meyer, PLUNKETT COONEY, at 333 Bridge Street, Ste. 530, Grand Rapids, MI 49504, Attorney for Defendants Village of Lakewood Club, and Lisa Swanson.

And I mailed a copy to: Samantha Reasner, at DEPARTMENT OF ATTORNEY GENERAL, P.O. Box 30754, Lansing, MI 48909, Attorney for Defendant William Duncan Schuette, on September 09, 2019.

CLARENCE OTWORTH
187 EAST DANIELS ROAD
TWIN LAKED, MI 49457
SECRET SERVICE KILLED JFK



OFFICE OF THE CLERK
UNITED STATES DISTRICT COURT
399 FEDERAL BUILDING
110 MICHIGAN STREET, N.W.
GRAND RAPIDS, MI 49503